

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

BOSTON PARENT COALITION FOR )  
ACADEMIC EXCELLENCE CORP., )  
Plaintiff, )  
v. )  
BOSTON SCHOOL COMMITTEE and )  
MARY SKIPPER, in her official capacity as )  
Superintendent of the Boston Public Schools, )  
Defendants. )

No. 1:25-cv-12015-WGY

**PLAINTIFF'S ASSENTED  
TO MOTION TO CONTINUE  
THE HEARING DATE**

Plaintiff Boston Parent Coalition for Academic Excellence hereby moves for a continuance of the November 17, 2025, hearing this Court has set on Defendants' motion to dismiss. (ECF No. 23). Consistent with the wishes of counsel for Defendants Boston School Committee and Superintendent Mary Skipper, Plaintiff respectfully requests that the hearing be rescheduled to a date as soon as possible after December 3, 2025. Counsel for Defendants assent to this motion. In support of the motion, Plaintiff states:

1. Defendants' motion to dismiss and accompanying memorandum of law were filed and served on September 11, 2025. (ECF Nos. 19, 20).

2. On September 15, 2025, this Court granted Plaintiff's motion to extend the deadline to file a response to Defendants' motion until October 16, 2025. (ECF No. 22). On the same day, the Court set a hearing on the motion for November 17, 2025. (ECF No. 23).

3. Plaintiff's lead counsel Christopher M. Kieser intends to argue the motion. However, Mr. Kieser is scheduled to argue in the New York Court of Appeals on November 19, 2025. The case is entitled *In the Matter of The Coalition for Fairness in Soho and Noho, Inc. v.*

*City of New York*, APL-2025-00028. Mr. Kieser has been admitted in that court pro hac vice and will argue the case for the Respondents, the Coalition for Fairness in Soho and Noho, Inc.

4. Because of the travel involved and the important constitutional issues present in both cases, both counsel and the Court would benefit from a continuance to allow full preparation for the hearing.

5. This is Plaintiff's first request for a continuance. Plaintiff respectfully represents that this continuance will not prejudice any party and is in the interests of justice.

6. Defendants' counsel, John M. Simon, Esq., has been contacted about this motion via e-mail and assented to it.

Dated: September 23, 2025.

Respectfully submitted,

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\**Pro Hac Vice*

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**CERTIFICATE OF SERVICE**

I, Christopher M. Kieser, hereby certify that the foregoing document was served on the date referenced above on all represented Parties through PACER/NEXTGEN, and that there are no unrepresented participants.

/s/ Christopher M. Kieser

CHRISTOPHER M. KIESER